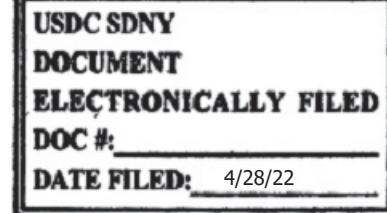


Morgan Lewis

Christopher A. Parlo
Partner
+1.212.309.6062
chris.parlo@morganlewis.com



April 27, 2022

VIA ECF

The Hon. Barbara C. Moses, U.S.M.J.
U.S. District Court for the Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

MEMO ENDORSED

Re: Julian et al. v. Metropolitan Life Ins. Co.
No. 17cv957

Your Honor:

We represent Defendant Metropolitan Life Insurance Company ("MetLife" or "Defendant") in the above-referenced matter. Together with counsel for Plaintiffs, we respectfully submit this letter requesting an extension of time from April 29, 2022 until May 27, 2022 for the parties to file Offers of Judgment with respect to Plaintiffs Debra Julian's and Kimberly Harris' claims under the Fair Labor Standards Act ("FLSA") in the above-referenced matter. This is the parties' first request for an extension of this deadline.

As this Court may recall, on March 11, 2022, the parties informed the Court that they had agreed to resolve Plaintiffs' remaining individual claims in this case, and requested that any deadline to seek FLSA release approval be adjourned *sine die* and that the parties be given until April 29, 2022 to submit Rule 68 Offers of Judgment to the Court resolving Plaintiffs Julian's and Harris' FLSA claims. The Court granted the parties' application on March 14, 2022. Dkt. 389.

The parties are making good progress on the remaining items which need to be resolved before the filing of Offers of Judgment. The parties are hopeful that all issues will be resolved in the near future and that the Offers of Judgment will be promptly filed on the Court's docket. The parties therefore respectfully request that the Court allow the parties until May 27, 2022 to submit the aforementioned Rule 68 Offers of Judgment to the Court.

We thank the Court in advance for its consideration.

Morgan, Lewis & Bockius LLP

101 Park Avenue
New York, NY 10178-0060
United States

T +1.212.309.6000
F +1.212.309.6001

The Hon. Barbara C. Moses, U.S.M.J.
April 27, 2022
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Respectfully submitted,

/s/ Christopher A. Parlo
Christopher A. Parlo

cc: All counsel of record (via ECF)

Application GRANTED. The deadline to submit Rule 68 Offers of Judgment is extended to **May 27, 2022**. SO ORDERED.



Barbara Moses
United States Magistrate Judge
April 28, 2022